

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

JAMAAR LA’KENDRIC TUKES,	§	
Petitioner,	§	
	§	
v.	§	Civil Action No. 1:18cv363
	§	
LORIE DAVIS, Director,	§	
Texas Department of Criminal	§	
Justice, Correctional Institutions	§	
Division,	§	
Respondent.	§	

**RESPONDENT’S MOTION TO SUBSTITUTE COUNSEL
FOR THE DIRECTOR WITH BRIEF IN SUPPORT**

The Director was last represented in this cause by Assistant Attorney General Cara Hanna. Because Ms. Hanna is leaving the Office of the Attorney General for new employment, it has become necessary to reassign this case to the undersigned Assistant Attorney General. As a result, the undersigned moves this Court to allow Ms. Hanna to withdraw and to permit the undersigned to substitute in as the Assistant Attorney General representing the Director in this federal habeas action.

The undersigned has been licensed to practice in the State of Texas since November 3, 2006, and is a member in good standing of the State Bar of Texas. The undersigned is admitted to practice in all of the United States District Courts of Texas. All future correspondence should be sent to the undersigned’s attention.

For the foregoing reasons, the undersigned moves this Court to allow Assistant Attorney General Cara Hanna to withdraw and to substitute the

undersigned as the Assistant Attorney General to represent the Director in this federal habeas corpus action.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

JEFF MATEER
First Assistant Attorney General

ADRIENNE MCFARLAND
Deputy Attorney General for
Criminal Justice

EDWARD L. MARSHALL
Chief, Criminal Appeals Division

*Lead Counsel

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH*
Assistant Attorney General
State Bar No. 24055632

P. O. Box 12548, Capitol Station
Austin, Texas 78711
(512) 936-1400
(512) 936-1280 (FAX)

ATTORNEYS FOR RESPONDENT

CERTIFICATE OF CONFERENCE

I do hereby certify that a conference is not possible because Petitioner is incarcerated. Respondent will not speculate on whether the Petitioner will oppose this motion.

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH
Assistant Attorney General

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing motion has been served by placing same in the United States Mail, postage prepaid, on this the 28th day of February 2019, addressed to:

Jamaar La’Kendric Tukes
TDCJ #2114239
Stevenson Unit
1525 FM 766
Cuero, TX 77954

/s/ Jessica Manojlovich
JESSICA MANOJLOVICH
Assistant Attorney General